

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

PAMELA S. SMALL,

Plaintiff,

v.

THE STATE OF NEW YORK, et al.,

Defendants.

**ATTORNEY
AFFIRMATION**

Civil Action No.:
1:12-cv-01236(WMS)

JENNIFER A. SHOEMAKER, ESQ., an attorney at law, duly licensed to practice law in the State of New York, hereby makes the following statements under penalties of perjury:

1. I am a partner with the firm of Underberg & Kessler LLP, attorneys for Plaintiff in the above-captioned matter.

2. I have represented Plaintiff from the inception of this case. As such, I am fully familiar with the facts and circumstances surrounding this matter.

3. I submit this Affirmation in support of Plaintiff's request for reimbursement of post-trial attorneys' fees and costs.

4. Following trial, Plaintiff's counsel was required to draft and file several post-trial motions.

5. In addition, Plaintiff's counsel was required to draft and file responses and replies to the post-trial motions filed by the Defendants.

6. The Court's Decision dated April 15, 2019, awarded attorneys' fees and costs to the Plaintiff. As such, post-trial fees and costs should be awarded as well.

7. Plaintiff reserved her right to supplement her fee request to include time preparing and defending these post-trial motions in the initial request for an award of attorney's fees and costs.

8. Attached as **Exhibit A** is our firm's billing statement reflecting time billed for post-trial work from the time of our last request for attorneys' fees to the present.

9. Attached as **Exhibit B** is our firm's billing statement reflecting costs billed for post-trial work from the time of our last request for attorneys' fees to the present.

10. The Court was previously informed of the qualifications and experience of Ms. Shoemaker, Ms. Nadir and Ms. Hance in the initial request for an award of fees and costs filed in October and December, 2017. To summarize what has previously been relayed to the Court, Ms. Shoemaker has been practicing law for more than eighteen (18) years, most of which has been in the employment practice area. Ms. Nadir has over eight (8) years of experience in the employment practice area. Ms. Hance has more than twenty-eight years' experience as a litigation paralegal.

11. Based on the experience of our attorneys and staff, the amount of time and hourly rates billed are reasonable and warranted.

12. Upon review of our previous motion submitted for fees and costs, it came to my attention that our online research costs were inadvertently omitted from that submission. As such, attached as **Exhibit C** is our firm's billing statement for all online research from the beginning of this case to the present. I ask that the Court award reimbursement for all online research in this matter.

WHEREFORE, based on the foregoing, this Court should grant Plaintiff's request for an award of post-trial attorneys' fees and costs and the cost of all online research from the beginning of this case to the present.

DATED: April 25, 2019
Rochester, New York

UNDERBERG & KESSLER LLP

s/Jennifer A. Shoemaker
Jennifer A. Shoemaker, Esq., of Counsel
Attorneys for Plaintiff
300 Bausch & Lomb Place
Rochester, New York 14604
Telephone: (585) 258-2500
jshoemaker@underbergkessler.com

EXHIBIT A

Underberg & Kessler LLP Billing Instruction Worksheet

Page: 1
04/25/19 7:24 AM

Account: Pamela Small/Pamela Small vs. NYS Department of Corrections
Requested By: LORI E. GORDON
Draft Bill Number: 373551
Draft Bill Date: 04/22/19

Client(s) / Matter(s): 999250 / 1
 Pamela Small / Pamela Small vs. NYS Department of Corrections

Contact Name:

Billing Address:

Pamela Small
 14 Fath Drive, #5
 Cheektowaga, NY 14225

Timekeeper Assignments:

Billing: JENNIFER SHOEMAKER
Responsible: JENNIFER SHOEMAKER
Originating: JENNIFER SHOEMAKER

<u>BILLING TO DATE</u>	<u>HOURS</u>	<u>FEES</u>	<u>DIRECT EXPENSES</u>	<u>INDIRECT EXPENSES</u>	<u>AGED ACCOUNTS RECEIVABLE</u>
RELIEVED:	0.00	\$0.00	\$0.00	\$0.00	CURRENT \$0.00
BILLED:	0.00	\$0.00	\$0.00	\$0.00	30 DAYS \$0.00
VARIANCE:		\$0.00	\$0.00	\$0.00	60 DAYS \$0.00
% OF REALIZATION:		100.0 %	100.0 %	100.0 %	90 DAYS \$0.00
BILLING WRITE UP:		\$0.00	\$0.00	\$0.00	120+ DAYS \$0.00
BILLING WRITE DOWN:		\$0.00	\$0.00	\$0.00	TOTAL \$0.00
RECEIVABLE WRITE OFF:		\$0.00	\$0.00	\$0.00	
TOTAL OUTSTANDING:		\$0.00	\$0.00	\$0.00	UNAP. CASH: \$0.00
					TRUST BAL.: \$0.00

Billing Instructions:

☐ Bill In Full
☐ Bill Fees \$ _____
☐ Bill Costs \$ _____
☐ Total Fees/Costs \$ _____

☐ Reject In Full
☐ Write Off in Full
☐ Apply Trust Funds \$ _____
☐ Apply Unapplied Cash \$ _____

Bookkeeping Department Only:

Bill Number: _____
 Bill Date: _____
 Bill Mail Date: _____
 Billed By: _____

Underberg & Kessler LLP
Billing Instruction Worksheet

Billing Attorney Approval: _____

Date: _____

Page: 2
04/25/19 7:24 AM

Underberg & Kessler LLP Billing Instruction Worksheet

Page: 3
04/25/19 7:24 AM

Matter Opened: 9/1/2011

Assigned Bill Format: UKDOLLAR
Billing Frequency: Demand

Draft Bill Fee Amount: \$60,975.00 Draft Bill Cost Amount: \$11,218.64 Draft Bill Total: \$72,193.64 Last Bill Amount: \$0.00

Last Payment: n/a
Last Bill Date: n/a
Last Time Worked: 04/24/2019
Last Cost Entered: 04/02/2019

Fees and Costs Thru Date: 4/22/2019

Area of Law: DOMESTIC RELATIONS

Office: ROCHESTER
Department: LITIGATION

Underberg & Kessler LLP

Billing Instruction Worksheet

Page: 4
04/25/19 7:24 AM

Timekeeper Summary

<u>Timekeeper Name</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>	<u>BILL THIS AMOUNT:</u>
ALINA NADIR	\$260.00	165.6	\$43,056.00	_____
ALINA NADIR	\$270.00	1.5	\$405.00	_____
JANICE HANCE	\$175.00	15.8	\$2,765.00	_____
JANICE HANCE	\$180.00	6.9	\$1,242.00	_____
JENNIFER SHOEMAKER	\$320.00	35.1	\$11,232.00	_____
JENNIFER SHOEMAKER	\$325.00	7	\$2,275.00	_____
TOTAL:			\$60975.00	

Fees

<u>CLIENT CODE</u>	<u>MATTER CODE</u>	<u>WORK DATE</u>	<u>TRANSACTION No.</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>	<u>BILL THIS AMOUNT:</u>
999250	1	09/28/18	3045909	JANICE HANCE	Return from Buffalo following conclusion of trial; attend conference calls with J. Shoemaker and A. Nadir with media; interoffice conferences with attorneys flowing trial result.	4.00	\$175.00	\$700.00	_____
999250	1	10/01/18	3048899	JANICE HANCE	Receipt and review of voluminous e-filings during the trial; download and save jury verdict form; e-mails from and to T. Leatherland regarding jury result.	.50	\$175.00	\$87.50	_____
999250	1	10/01/18	3055897	JENNIFER SHOEMAKER	Review court filing notices; organize notes and file.	.50	\$320.00	\$160.00	_____
999250	1	10/02/18	3047839	ALINA NADIR	Conduct legal research into Title VII fee applications and prejudgment interest.	4.90	\$260.00	\$1,274.00	_____
999250	1	10/03/18	3048019	ALINA NADIR	Continue legal research related to filing motion for fees, interest and costs.	6.70	\$260.00	\$1,742.00	_____
999250	1	10/03/18	3056672	JENNIFER SHOEMAKER	Research and conferences regarding attorneys fees and pre and post judgment interest and costs.	1.40	\$320.00	\$448.00	_____
999250	1	10/04/18	3048369	ALINA NADIR	Continue legal research related to filing motion for fees, interest and costs; begin drafting motion for same.	4.40	\$260.00	\$1,144.00	_____
999250	1	10/04/18	3052204	JANICE HANCE	Receipt and review of letter from the NYS Insurance Fund regarding workers' comp lien; e-mails to and from J. Shoemaker and A. Nadir regarding same.	.30	\$175.00	\$52.50	_____

Underberg & Kessler LLP

Billing Instruction Worksheet

								Page: 5	
CLIENT CODE	MATTER CODE	WORK DATE	TRANSACTION No.	TIMEKEEPER	DESCRIPTION	HOURS	RATE	04/25/19	7:24 AM
								AMOUNT	BILL THIS AMOUNT:
999250	1	10/04/18	3056709	JENNIFER SHOEMAKER	Review letter from state insurance fund; conferences with media; conferences regarding workers compensation lein.	.70	\$320.00	\$224.00	
999250	1	10/05/18	3052216	JANICE HANCE	Receipt and review of additional article regarding jury verdict; review e-mails from R. Silberstein regarding interview with DOCCS counsel; interoffice conference with A. Nadir.	.30	\$175.00	\$52.50	
999250	1	10/05/18	3057709	JENNIFER SHOEMAKER	Conferences regarding attorneys' fees motion and interest; research and review time entries.	1.60	\$320.00	\$512.00	
999250	1	10/08/18	3048770	ALINA NADIR	Conduct legal research re: WDNY standard for reasonable attorney fees and rates.	6.40	\$260.00	\$1,664.00	
999250	1	10/08/18	3052227	JANICE HANCE	Review additional article regarding verdict and forward to J. Shoemaker and A. Nadir; interoffice conference with A. Nadir regarding same, status, motions, etc.	.30	\$175.00	\$52.50	
999250	1	10/09/18	3049090	ALINA NADIR	Conduct legal research re: hourly rates found to be acceptable in WDNY.	2.90	\$260.00	\$754.00	
999250	1	10/11/18	3050636	ALINA NADIR	Continue research related to motion for fees, costs, interest; draft motion.	2.90	\$260.00	\$754.00	
999250	1	10/11/18	3052339	JANICE HANCE	Receipt and review of Order entering Judgment and interoffice conference with A. Nadir regarding same; receipt and review of Judgment filed by the Court.	.40	\$175.00	\$70.00	
999250	1	10/11/18	3056741	JENNIFER SHOEMAKER	Review text order directing entry.	.20	\$320.00	\$64.00	
999250	1	10/12/18	3050945	ALINA NADIR	Draft motion for fees, costs and interest.	1.80	\$260.00	\$468.00	
999250	1	10/15/18	3053948	JANICE HANCE	Organize and relocate file upon completion of trial.	.60	\$175.00	\$105.00	
999250	1	10/16/18	3051475	ALINA NADIR	Draft motion for fees, costs and interest; continue research for hourly rates found to be reasonable in WDNY.	5.90	\$260.00	\$1,534.00	
999250	1	10/17/18	3054101	JANICE HANCE	Review file regarding status, preparation of motion for fees and costs, etc.; e-mails to and from L. Gordon regarding costs report; receipt and review of costs report; receipt and review of two additional articles regarding verdict and DOCCS	.60	\$175.00	\$105.00	

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Billing Instruction Worksheet

CLIENT CODE	MATTER CODE	WORK DATE	TRANSACTION No.	TIMEKEEPER	DESCRIPTION	HOURS	RATE	Page: 04/25/19	6 7:24 AM
								AMOUNT	BILL THIS AMOUNT:
999250	1	10/17/18	3057552	ALINA NADIR	environment. Conduct legal research re: recouping expert fees; draft motion for fees, costs and interest.	5.60	\$260.00	\$1,456.00	_____
999250	1	10/18/18	3052326	ALINA NADIR	Review list of litigation costs and identify necessary revisions; draft affirmation for motion for fees.	2.10	\$260.00	\$546.00	_____
999250	1	10/18/18	3054128	JANICE HANCE	Interoffice conferences with A. Nadir to obtain costs report and what it must entail to be accepted and approved by the court; precept and review of draft report and follow up regarding trial expenses and narrative descriptions to be added.	1.10	\$175.00	\$192.50	_____
999250	1	10/19/18	3057702	JENNIFER SHOEMAKER	Work on motion for attorneys fees; research regarding attorneys fees; conference with A. Nadir.	2.30	\$320.00	\$736.00	_____
999250	1	10/22/18	3054182	JANICE HANCE	Locate and download cases cited in Brief for motion for attorney's fees for use in preparing motion for our client; Shepardize cases.	1.60	\$175.00	\$280.00	_____
999250	1	10/23/18	3054197	JANICE HANCE	Continue locating, downloading and Shepardizing cases cited in Brief.	1.50	\$175.00	\$262.50	_____
999250	1	10/23/18	3058138	ALINA NADIR	Revise motion for fees and affirmation.	2.10	\$260.00	\$546.00	_____
999250	1	10/24/18	3053774	ALINA NADIR	Revise motion for fees, costs and interest; research re: deadline for fee applications; conference with J. Shoemaker re: same.	5.30	\$260.00	\$1,378.00	_____
999250	1	10/24/18	3057697	JENNIFER SHOEMAKER	Review all time entries for motion for attorneys fees; research regarding interest and costs; conferences with A. Nadir regarding motion; review and revise motion papers.	8.40	\$320.00	\$2,688.00	_____
999250	1	10/25/18	3054139	ALINA NADIR	Draft motion for fees, costs and interest; complete additional research for supporting case law re: reasonableness of award generally; review complete BIWs and determine best method/format to include in motion; finalize motion and affirmation and file.	8.90	\$260.00	\$2,314.00	_____
999250	1	10/25/18	3057295	JANICE HANCE	E-mails from and to A. Nadir regrading the	1.00	\$175.00	\$175.00	_____

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Billing Instruction Worksheet

CLIENT CODE	MATTER CODE	WORK DATE	TRANSACTION No.	TIMEKEEPER	DESCRIPTION	HOURS	RATE	Page: 04/25/19	7:24 AM
								AMOUNT	BILL THIS AMOUNT:
999250	1	10/25/18	3057691	JENNIFER SHOEMAKER	filing of the motion; e-mails to and from and interoffice conferences with L. Gordon regarding costs report and narrative entries; receipt and review of same. Review and revise attorneys fees motion.	1.50	\$320.00	\$480.00	_____
999250	1	10/26/18	3057367	JANICE HANCE	Receipt and review of filing notification of motion and download and save same; receipt and review of filing notification from the Court requesting filing correction; interoffice conference with A. Nadir regarding same.	.40	\$175.00	\$70.00	_____
999250	1	11/07/18	3061996	JANICE HANCE	Receipt and review of text order advising of motion due date.	.20	\$175.00	\$35.00	_____
999250	1	11/07/18	3065503	JENNIFER SHOEMAKER	Review scheduling notice from court regarding motion for attorneys' fees.	.20	\$320.00	\$64.00	_____
999250	1	11/08/18	3065519	JENNIFER SHOEMAKER	Review motion for new trial; notice to appeal; office conference regarding same.	.50	\$320.00	\$160.00	_____
999250	1	11/09/18	3059867	ALINA NADIR	Review defendants' Rule 59 motions; emails to/from J. Shoemaker re: same and re: NYS's motion for extension to respond to fee application; draft response affirmation to motion for extension.	5.40	\$260.00	\$1,404.00	_____
999250	1	11/09/18	3062013	JANICE HANCE	Receipt and review of Cuer's motion to alter judgment and State's motion to amend and request a new trial and motions requesting an extension of time to respond to motion for fees.	.40	\$175.00	\$70.00	_____
999250	1	11/09/18	3065525	JENNIFER SHOEMAKER	Review motion to extend time to answer motion for attorneys fees; review and revise response to motion; conference with A. Nadir.	.50	\$320.00	\$160.00	_____
999250	1	11/13/18	3060692	ALINA NADIR	Phone call with Second Circuit re: admission to court for defendant's appeal.	.20	\$260.00	\$52.00	_____
999250	1	11/13/18	3062097	JANICE HANCE	Receipt and review of notice from Court regarding Rule for Court of Appeals on filing forms C&D; interoffice conference with A. Nadir regarding same.	.30	\$175.00	\$52.50	_____
999250	1	11/13/18	3065772	JENNIFER	Review Second Circuit efilng regarding	.20	\$320.00	\$64.00	_____

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Billing Instruction Worksheet

CLIENT CODE	MATTER CODE	WORK DATE	TRANSACTION No.	TIMEKEEPER	DESCRIPTION	HOURS	RATE	Page: 8 04/25/19 7:24 AM	BILL THIS AMOUNT:
								AMOUNT	
999250	1	11/14/18	3066037	SHOEMAKER	forms.				
999250	1	11/15/18	3061712	ALINA NADIR	Work on responses to Rule 59 motions.	3.70	\$260.00	\$962.00	
				ALINA NADIR	Begin drafting and legal research for responses to Rule 59 motions.	6.30	\$260.00	\$1,638.00	
999250	1	11/15/18	3065829	JENNIFER	Conference regarding responsive brief.	.20	\$320.00	\$64.00	
				SHOEMAKER					
999250	1	11/15/18	3065887	JANICE HANCE	Review court rules regarding motion response dates in absence of a scheduling order; forward same to J. Shoemaker and A. Nadir; e-mails from J. Shoemaker and A. Nadir regarding same; receipt and review of the Court's text order regarding response dates.	.90	\$175.00	\$157.50	
999250	1	11/16/18	3066039	ALINA NADIR	Work on Rule 59 motion responses.	4.10	\$260.00	\$1,066.00	
999250	1	11/20/18	3062185	ALINA NADIR	Work on FRCP 59 motion responses.	3.90	\$260.00	\$1,014.00	
999250	1	11/26/18	3062845	ALINA NADIR	Continue work on responses to Rule 59 motions.	1.10	\$260.00	\$286.00	
999250	1	11/27/18	3066097	ALINA NADIR	Work on FRCP 59 motions responses.	3.10	\$260.00	\$806.00	
999250	1	11/28/18	3066108	ALINA NADIR	Work on motion responses.	5.10	\$260.00	\$1,326.00	
999250	1	11/29/18	3066111	ALINA NADIR	Work on motion responses.	6.40	\$260.00	\$1,664.00	
999250	1	11/30/18	3064524	ALINA NADIR	Continue work on responses to Rule 59 motions; relevant legal research.	5.10	\$260.00	\$1,326.00	
999250	1	12/03/18	3066241	ALINA NADIR	Draft responses to defendants' motions for new trial or to alter judgment.	6.30	\$260.00	\$1,638.00	
999250	1	12/04/18	3066398	ALINA NADIR	Draft responses to defendants' motions for new trial or to alter judgment.	4.80	\$260.00	\$1,248.00	
999250	1	12/05/18	3066700	ALINA NADIR	Draft responses to defendants' motions for new trial or to alter judgment.	6.10	\$260.00	\$1,586.00	
999250	1	12/06/18	3067742	JANICE HANCE	E-mails from client and A. Nadir regarding status.	.20	\$175.00	\$35.00	
999250	1	12/06/18	3073013	JENNIFER	Conference regarding appeal and motion to set aside verdict; review and revise draft response.	1.30	\$320.00	\$416.00	
				SHOEMAKER					
999250	1	12/06/18	3073438	ALINA NADIR	Draft responses to defendants' motions for new trial or to alter judgment.	6.10	\$260.00	\$1,586.00	
999250	1	12/07/18	3067229	ALINA NADIR	Draft responses to defendants' motions for new trial or to alter judgment.	6.40	\$260.00	\$1,664.00	
999250	1	12/07/18	3068695	JANICE HANCE	E-mails from A. Nadir and client regarding status.	.20	\$175.00	\$35.00	

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Billing Instruction Worksheet

CLIENT CODE	MATTER CODE	WORK DATE	TRANSACTION No.	TIMEKEEPER	DESCRIPTION	HOURS	RATE	Page: 9 04/25/19 7:24 AM AMOUNT	BILL THIS AMOUNT:
999250	1	12/07/18	3073282	JENNIFER SHOEMAKER	Conference regarding next steps.	.20	\$320.00	\$64.00	
999250	1	12/10/18	3067655	ALINA NADIR	Draft responses to defendants' motions for new trial or to alter judgment.	8.80	\$260.00	\$2,288.00	
999250	1	12/10/18	3068716	JANICE HANCE	Receipt and review and download affidavit filed by J. Wujcik.	.20	\$175.00	\$35.00	
999250	1	12/10/18	3073316	JENNIFER SHOEMAKER	Review and revise motion response; conferences with A. Nadir; review filings from opposing counsel.	2.80	\$320.00	\$896.00	
999250	1	12/10/18	3073544	JENNIFER SHOEMAKER	Review and revise motion response.	1.90	\$320.00	\$608.00	
999250	1	12/11/18	3067845	ALINA NADIR	Review defendants' responses to plaintiff's motion for fees, interest, and costs; draft reply to defendants' responses to plaintiff's motion for fees, interest, and costs.	2.60	\$260.00	\$676.00	
999250	1	12/11/18	3068729	JANICE HANCE	Receipt and review of e-filed motions by Plaintiff and the State; download and review same; interoffice conference with J. Shoemaker regarding fees.	.40	\$175.00	\$70.00	
999250	1	12/12/18	3068126	ALINA NADIR	Draft reply to defendants' responses to plaintiff's motion for fees, interest, and costs.	4.70	\$260.00	\$1,222.00	
999250	1	12/13/18	3068405	ALINA NADIR	Draft reply to defendants' responses to plaintiff's motion for fees, interest, and costs.	4.80	\$260.00	\$1,248.00	
999250	1	12/14/18	3068663	ALINA NADIR	Draft reply to defendants' responses to plaintiff's motion for fees, interest, and costs.	4.30	\$260.00	\$1,118.00	
999250	1	12/14/18	3073542	JENNIFER SHOEMAKER	Review and revise motion response.	2.00	\$320.00	\$640.00	
999250	1	12/17/18	3069222	ALINA NADIR	Draft reply to defendants' responses to plaintiff's motion for fees, interest, and costs and file same.	5.90	\$260.00	\$1,534.00	
999250	1	12/17/18	3070349	JANICE HANCE	Receipt and review of e-filed motions; download and save same.	.40	\$175.00	\$70.00	
999250	1	12/17/18	3073499	JENNIFER SHOEMAKER	Several conferences regarding interest and attorneys' fees; review draft.	1.80	\$320.00	\$576.00	
999250	1	12/17/18	3073541	JENNIFER SHOEMAKER	Work on motion response.	2.80	\$320.00	\$896.00	

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Billing Instruction Worksheet

CLIENT CODE	MATTER CODE	WORK DATE	TRANSACTION No.	TIMEKEEPER	DESCRIPTION	HOURS	RATE	Page: 04/25/19	10 7:24 AM
								AMOUNT	BILL THIS AMOUNT:
999250	1	12/18/18	3069535	ALINA NADIR	Review Defendant Cuer's Reply to Rule 59 Motion.	.50	\$260.00	\$130.00	_____
999250	1	12/19/18	3073552	JENNIFER SHOEMAKER	Review second circuit rules and procedures.	1.50	\$320.00	\$480.00	_____
999250	1	12/20/18	3073537	JENNIFER SHOEMAKER	Work on motion response.	2.60	\$320.00	\$832.00	_____
999250	1	01/14/19	3079784	JANICE HANCE	Receipt and review of correspondence from J. Wujcik to the Second Circuit advising of status of motions pending in District Court.	.20	\$180.00	\$36.00	_____
999250	1	02/13/19	3093757	JENNIFER SHOEMAKER	Email with WC board regarding lien and appeal.	.20	\$325.00	\$65.00	_____
999250	1	02/14/19	3089642	JANICE HANCE	Receipt and review of e-mails from State Insurance Fund and J. Shoemaker regarding workers' comp lien.	.20	\$180.00	\$36.00	_____
999250	1	02/14/19	3093815	JENNIFER SHOEMAKER	Review stay status letter for second circuit.	.20	\$325.00	\$65.00	_____
999250	1	03/28/19	3103228	JANICE HANCE	Review file regarding F. Annarino witness fees and days of testimony; e-mail to accounting requesting copy of payment to F. Annarino.	.20	\$180.00	\$36.00	_____
999250	1	03/29/19	3103369	JANICE HANCE	Receipt and review of information regarding checks issued to F. Annarino for testifying at trial; review file regarding 2 days of testifying; arrange for payment of witness fee and mileage for second day of testimony.	.40	\$180.00	\$72.00	_____
999250	1	04/02/19	3106500	JANICE HANCE	Review file regarding previous payments to F. Annarino and determine if checks were cashed; request additional checks for payment of witness fees and mileage reimbursement; prepare letter to witness forwarding same.	.40	\$180.00	\$72.00	_____
999250	1	04/02/19	3109883	JENNIFER SHOEMAKER	Review email correspondence from F. Annarino regarding subpoena fee; conference with J. Hance.	.30	\$325.00	\$97.50	_____
999250	1	04/15/19	3109835	JENNIFER SHOEMAKER	Review Court's decision regarding motions to set aside verdict, attorneys' fees, costs, etc. Several office conferences regarding	1.50	\$325.00	\$487.50	_____

Underberg & Kessler LLP

Billing Instruction Worksheet

CLIENT CODE	MATTER CODE	WORK DATE	TRANSACTION No.	TIMEKEEPER	DESCRIPTION	HOURS	RATE	Page: 04/25/19 AMOUNT	11 7:24 AM BILL THIS AMOUNT:
999250	1	04/15/19	3110093	ALINA NADIR	same. Review and analyze Court's decision on post-trial motions, including attorney's fees, pre and post judgment interest and remittitur; discuss same with J. Shoemaker and J. Hance.	1.50	\$270.00	\$405.00	_____
999250	1	04/16/19	3108438	JANICE HANCE	Thorough review of the Court's Decision and Order for post-trial motions; communications with J. Shoemaker and A. Nadir regarding same, trial on damages alone for C. Cuer and how to proceed.	1.30	\$180.00	\$234.00	_____
999250	1	04/17/19	3109836	JENNIFER SHOEMAKER	Lengthy telephone conference with client explaining judge's post trial decision; review decision.	2.00	\$325.00	\$650.00	_____
999250	1	04/18/19	3109839	JENNIFER SHOEMAKER	Conference with A. Nadir regarding client and whether she will accept remittitur.	.20	\$325.00	\$65.00	_____
999250	1	04/20/19	3109997	JENNIFER SHOEMAKER	Conference with client regarding remittitur.	.20	\$325.00	\$65.00	_____
999250	1	04/22/19	3109845	JENNIFER SHOEMAKER	Text with client regarding decision on remittitur.	.20	\$325.00	\$65.00	_____
999250	1	04/22/19	3109846	JANICE HANCE	E-mails from and to Dr. Reagles' office inquiring as to status of settlement and appeal; interoffice conference with J. Shoemaker regarding same, motion for post-trial fees and the appeal process; request billing report and receipt and review of same; review previous motion for fees and prepare Affidavit requesting award of post-trial fees and costs.	1.90	\$180.00	\$342.00	_____
999250	1	04/23/19	3109844	JENNIFER SHOEMAKER	Review court's decision; review and revise client affidavit.	.50	\$325.00	\$162.50	_____
999250	1	04/23/19	3109847	JANICE HANCE	Review file regarding client's desire to accept the court's remittitur and moving forward; prepare affidavit for client's signature confirming same.	1.60	\$180.00	\$288.00	_____
999250	1	04/24/19	3109849	JENNIFER SHOEMAKER	Review and revise supplemental motion for attorneys' fees and affidavit from client regarding remittitur; review time entries and costs and several conferences regarding	1.70	\$325.00	\$552.50	_____

Underberg & Kessler LLP

Billing Instruction Worksheet

CLIENT CODE	MATTER CODE	WORK DATE	TRANSACTION No.	TIMEKEEPER	DESCRIPTION	HOURS	RATE	Page: 04/25/19	12 7:24 AM
								AMOUNT	BILL THIS AMOUNT:
999250	1	04/24/19	3109894	JANICE HANCE	online research inadvertently excluded from initial motion for costs. Conference with client regarding affidavit. Review file regarding fees and costs billing; review previously billing statements regarding online research costs; revise J. Shoemaker Affidavit to include costs for online research; revise P. Small Affidavit.	.70	\$180.00	\$126.00	
							TOTAL:	\$60975.00	

EXHIBIT B

Underberg & Kessler LLP

Billing Instruction Worksheet

Page: 1
04/24/19 11:09 AM

Account: Pamela Small/Pamela Small vs. NYS Department of Corrections
Requested By: LORI E. GORDON
Draft Bill Number: 373551
Draft Bill Date: 04/22/19

Client(s) / Matter(s): 999250 / 1
 Pamela Small / Pamela Small vs. NYS Department of Corrections

Contact Name:

Billing Address:

Pamela Small
 14 Fath Drive, #5
 Cheektowaga, NY 14225

Timekeeper Assignments:

Billing: JENNIFER SHOEMAKER
Responsible: JENNIFER SHOEMAKER
Originating: JENNIFER SHOEMAKER

<u>BILLING TO DATE</u>	<u>HOURS</u>	<u>FEES</u>	<u>DIRECT EXPENSES</u>	<u>INDIRECT EXPENSES</u>	<u>AGED ACCOUNTS RECEIVABLE</u>
RELIEVED:	0.00	\$0.00	\$0.00	\$0.00	CURRENT \$0.00
BILLED:	0.00	\$0.00	\$0.00	\$0.00	30 DAYS \$0.00
VARIANCE:		\$0.00	\$0.00	\$0.00	60 DAYS \$0.00
% OF REALIZATION:		100.0 %	100.0 %	100.0 %	90 DAYS \$0.00
BILLING WRITE UP:		\$0.00	\$0.00	\$0.00	120+ DAYS \$0.00
BILLING WRITE DOWN:		\$0.00	\$0.00	\$0.00	TOTAL \$0.00
RECEIVABLE WRITE OFF:		\$0.00	\$0.00	\$0.00	
TOTAL OUTSTANDING:		\$0.00	\$0.00	\$0.00	UNAP. CASH: \$0.00
					TRUST BAL.: \$0.00

Billing Instructions:

[] Bill In Full
 [] Bill Fees \$ _____
 [] Bill Costs \$ _____
 [] Total Fees/Costs \$ _____

[] Reject In Full
 [] Write Off in Full
 [] Apply Trust Funds \$ _____
 [] Apply Unapplied Cash \$ _____

Bookkeeping Department Only:

Bill Number: _____
 Bill Date: _____
 Bill Mail Date: _____
 Billed By: _____

Underberg & Kessler LLP
Billing Instruction Worksheet

Billing Attorney Approval: _____

Date: _____

Page: 2
04/24/19 11:09 AM

Underberg & Kessler LLP Billing Instruction Worksheet

Page: 3
04/24/19 11:09 AM

Matter Opened: 9/1/2011

Assigned Bill Format: UKDOLLAR
Billing Frequency: Demand

Draft Bill Fee Amount: \$0.00 Draft Bill Cost Amount: \$2,098.96 Draft Bill Total: \$2,098.96 Last Bill Amount: \$0.00

Last Payment: n/a
Last Bill Date: n/a
Last Time Worked: 04/24/2019
Last Cost Entered: 04/02/2019

Fees and Costs Thru Date: 4/22/2019

Area of Law: DOMESTIC RELATIONS

Office: ROCHESTER
Department: LITIGATION

Underberg & Kessler LLP

Billing Instruction Worksheet

 Page: 4
 04/24/19 11:09 AM

Timekeeper Summary

Fees

Costs

CLIENT CODE	MATTER CODE	WORK DATE	TRANSACTION No.	TIMEKEEPER	COST DESCRIPTION	COST CODE	AMOUNT	BILL THIS AMOUNT:
999250	1	12/05/18	3072586	125059	On-line Computer Research - Online Research	ACOMPR	\$321.30	_____
999250	1	12/06/18	3072588	125059	On-line Computer Research - Online Research	ACOMPR	\$128.52	_____
999250	1	12/07/18	3072589	125059	On-line Computer Research -	ACOMPR	\$321.30	_____
999250	1	12/09/18	3072591	125059	On-line Computer Research - Online Research	ACOMPR	\$192.78	_____
999250	1	12/10/18	3072593	125059	On-line Computer Research - Online Research	ACOMPR	\$624.24	_____
999250	1	12/13/18	3072594	125059	On-line Computer Research - Online Research	ACOMPR	\$192.78	_____
999250	1	12/17/18	3072595	125059	On-line Computer Research - Online Research	ACOMPR	\$64.26	_____
999250	1	12/17/18	3092078	125059	Online Research - Electronic Court Records Search.	E106	\$1.20	_____
999250	1	01/31/19	3084726	125059	COMPUTER RESEARCH FIRM - Q3 2018- Online Research	FCOMPR	\$52.20	_____
999250	1	03/29/19	3102627	108737	CLIENT MISCELLANEOUS CHARGES - FRANK ANNARINO - Subpoena fee & mileage for 2nd Day of testimony	CMISC	\$100.19	_____
999250	1	04/02/19	3104400	108737	CLIENT MISCELLANEOUS CHARGES - FRANK ANNARINO - Witness Fee & Mileage Reimbursement for 2nd day of trial	CMISC	\$100.19	_____
TOTAL:							\$2098.96	

Cost Summary

Cost Description

CLIENT MISCELLANEOUS CHARGES
 COMPUTER RESEARCH FIRM
 On-line Computer Research
 Online Research

<u>Amount</u>	<u>BILL THIS AMOUNT:</u>
\$200.38	_____
\$52.20	_____
\$1,845.18	_____
\$1.20	_____
TOTAL:	
\$2098.96	

Trust History

EXHIBIT C

Underberg & Kessler LLP

Billing Instruction Worksheet

Page: 1
04/25/19 11:38 AM

Account: Pamela Small/Pamela Small vs. NYS Department of Corrections
Requested By: LORI E. GORDON
Draft Bill Number: 373551
Draft Bill Date: 04/22/19

Client(s) / Matter(s): 999250 / 1
 Pamela Small / Pamela Small vs. NYS Department of Corrections

Contact Name:

Billing Address:

Pamela Small
 14 Fath Drive, #5
 Cheektowaga, NY 14225

Timekeeper Assignments:

Billing: JENNIFER SHOEMAKER
Responsible: JENNIFER SHOEMAKER
Originating: JENNIFER SHOEMAKER

<u>BILLING TO DATE</u>	<u>HOURS</u>	<u>FEES</u>	<u>DIRECT EXPENSES</u>	<u>INDIRECT EXPENSES</u>	<u>AGED ACCOUNTS RECEIVABLE</u>	
RELIEVED:	0.00	\$0.00	\$0.00	\$0.00	CURRENT	\$0.00
BILLED:	0.00	\$0.00	\$0.00	\$0.00	30 DAYS	\$0.00
VARIANCE:		\$0.00	\$0.00	\$0.00	60 DAYS	\$0.00
% OF REALIZATION:		100.0 %	100.00 %	100.00 %	90 DAYS	\$0.00
BILLING WRITE UP:		\$0.00	\$0.00	\$0.00	120+ DAYS	\$0.00
BILLING WRITE DOWN:		\$0.00	\$0.00	\$0.00	TOTAL	\$0.00
RECEIVABLE WRITE OFF:		\$0.00	\$0.00	\$0.00		
TOTAL OUTSTANDING:		\$0.00	\$0.00	\$0.00	UNAP. CASH:	\$0.00
					TRUST BAL.:	\$0.00

Billing Instructions:

☐ Bill In Full
☐ Bill Fees \$ _____
☐ Bill Costs \$ _____
☐ Total Fees/Costs \$ _____

☐ Reject In Full
☐ Write Off in Full
☐ Apply Trust Funds \$ _____
☐ Apply Unapplied Cash \$ _____

Bookkeeping Department Only:

Bill Number: _____
 Bill Date: _____
 Bill Mail Date: _____
 Billed By: _____

Underberg & Kessler LLP
Billing Instruction Worksheet

Billing Attorney Approval: _____

Date: _____

Page: 2
04/25/19 11:38 AM

Underberg & Kessler LLP Billing Instruction Worksheet

Page: 3
04/25/19 11:38 AM

Matter Opened: 9/1/2011

Assigned Bill Format: UKDOLLAR
Billing Frequency: Demand

Draft Bill Fee Amount: \$0.00 Draft Bill Cost Amount: \$27,011.89 Draft Bill Total: \$27,011.89 Last Bill Amount: \$0.00

Last Payment: n/a
Last Bill Date: n/a
Last Time Worked: 04/24/2019
Last Cost Entered: 04/02/2019

Fees and Costs Thru Date: 4/22/2019

Area of Law: DOMESTIC RELATIONS

Office: ROCHESTER
Department: LITIGATION

Underberg & Kessler LLP

Billing Instruction Worksheet

Page: 4
04/25/19 11:38 AM

Timekeeper Summary

Fees

Costs

CLIENT CODE	MATTER CODE	WORK DATE	TRANSACTION No.	TIMEKEEPER	COST DESCRIPTION	COST CODE	AMOUNT	BILL THIS AMOUNT:
999250	1	05/06/13	2437153	110359	On-line Computer Research - On-line Computer Research	ACOMPR	\$271.00	_____
999250	1	05/08/13	2437155	110359	On-line Computer Research - On-line Computer Research	ACOMPR	\$118.65	_____
999250	1	05/13/13	2441211	108737	On-line Computer Research - On-line Computer Research	ACOMPR	\$37.28	_____
999250	1	05/16/13	2441212	108737	On-line Computer Research - On-line Computer Research	ACOMPR	\$157.51	_____
999250	1	09/25/14	2593597	118826	On-line Computer Research - On-line Computer Research - AN	ACOMPR	\$98.01	_____
999250	1	10/03/14	2600585	118826	On-line Computer Research - On-line Computer Research - AN	ACOMPR	\$140.76	_____
999250	1	10/08/14	2600591	118826	On-line Computer Research - On-line Computer Research - AN	ACOMPR	\$104.04	_____
999250	1	10/31/14	2608637	118826	On-line Computer Research - On-line Computer Research - AN	ACOMPR	\$85.59	_____
999250	1	11/04/14	2608639	118826	On-line Computer Research - On-line Computer Research - AN	ACOMPR	\$86.18	_____
999250	1	02/20/15	2644671	118826	On-line Computer Research - On-line Computer Research - AN	ACOMPR	\$52.22	_____
999250	1	02/23/15	2644672	118826	On-line Computer Research - On-line Computer Research - AN	ACOMPR	\$26.11	_____
999250	1	02/24/15	2644673	118826	On-line Computer Research - On-line Computer Research - AN	ACOMPR	\$20.88	_____
999250	1	03/21/15	2654465	118826	On-line Computer Research - On-line Computer Research - AN	ACOMPR	\$11.30	_____
999250	1	03/22/15	2654467	118826	On-line Computer Research - On-line Computer Research - AN	ACOMPR	\$16.96	_____
999250	1	03/26/15	2654469	118826	On-line Computer Research - On-line Computer Research - AN	ACOMPR	\$176.78	_____
999250	1	03/27/15	2654470	118826	On-line Computer Research - On-line Computer Research - AN	ACOMPR	\$88.39	_____
999250	1	03/30/15	2655790	118826	On-line Computer Research - On-line Computer Research - AN	ACOMPR	\$5.71	_____
999250	1	03/30/15	2655793	118826	On-line Computer Research - On-line Computer Research - AN	ACOMPR	\$59.57	_____

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Billing Instruction Worksheet

CLIENT CODE	MATTER CODE	WORK DATE	TRANSACTION No.	TIMEKEEPER	COST DESCRIPTION	COST CODE	Page: 5	
							04/25/19 11:38 AM	BILL THIS AMOUNT:
999250	1	05/22/15	2672677	118826	AN On-line Computer Research - Online Computer Research -	ACOMPR	\$260.58	_____
999250	1	05/22/15	2672680	118826	AXN On-line Computer Research - Online Computer Research -	ACOMPR	\$702.67	_____
999250	1	06/01/15	2678630	118826	AXN On-line Computer Research - On-line Computer Research -	ACOMPR	\$194.07	_____
999250	1	06/01/15	2678631	118826	AN On-line Computer Research - On-line Computer Research -	ACOMPR	\$602.39	_____
999250	1	06/01/15	2678632	118826	AN On-line Computer Research - On-line Computer Research -	ACOMPR	\$35.28	_____
999250	1	06/10/15	2678689	118826	AN On-line Computer Research - On-line Computer Research -	ACOMPR	\$68.51	_____
999250	1	06/11/15	2678690	118826	AN On-line Computer Research - On-line Computer Research -	ACOMPR	\$47.33	_____
999250	1	06/11/15	2678691	118826	AN On-line Computer Research - On-line Computer Research -	ACOMPR	\$34.25	_____
999250	1	07/06/15	2689764	118826	AN On-line Computer Research - On-line Computer Research -	ACOMPR	\$11.05	_____
999250	1	07/07/15	2689766	118826	AN On-line Computer Research - On-line Computer Research -	ACOMPR	\$22.10	_____
999250	1	07/08/15	2689767	118826	AN On-line Computer Research - On-line Computer Research -	ACOMPR	\$22.10	_____
999250	1	09/30/15	2715999	118826	AN On-line Computer Research - On-line Computer Research -	ACOMPR	\$45.56	_____
999250	1	05/25/16	2795130	118826	On-line Computer Research -	ACOMPR	\$481.14	_____
999250	1	05/26/16	2795140	108737	On-line Computer Research -	ACOMPR	\$53.46	_____
999250	1	06/06/16	2803140	108655	On-line Computer Research -	ACOMPR	\$53.46	_____
999250	1	06/07/16	2803149	116108	On-line Computer Research -	ACOMPR	\$267.30	_____
999250	1	06/08/16	2803156	118826	On-line Computer Research -	ACOMPR	\$53.46	_____
999250	1	06/09/16	2803179	108655	On-line Computer Research -	ACOMPR	\$53.46	_____
999250	1	06/06/17	2910795	118826	On-line Computer Research -	ACOMPR	\$3,175.20	_____
999250	1	06/12/17	2911653	118826	On-line Computer Research -	ACOMPR	\$160.38	_____
999250	1	06/13/17	2911656	118826	On-line Computer Research -	ACOMPR	\$946.08	_____
999250	1	06/14/17	2911658	118826	On-line Computer Research -	ACOMPR	\$320.76	_____
999250	1	06/14/17	2911659	120359	On-line Computer Research -	ACOMPR	\$134.46	_____
999250	1	06/19/17	2914256	118826	On-line Computer Research -	ACOMPR	\$641.52	_____
999250	1	06/22/17	2914365	118826	On-line Computer Research -	ACOMPR	\$374.22	_____
999250	1	06/26/17	2916035	118826	On-line Computer Research -	ACOMPR	\$978.48	_____

Underberg & Kessler LLP

Billing Instruction Worksheet

CLIENT CODE	MATTER CODE	WORK DATE	TRANSACTION No.	TIMEKEEPER	COST DESCRIPTION	COST CODE	Page: 6 04/25/19 11:38 AM	BILL THIS AMOUNT:
							AMOUNT	
999250	1	06/27/17	2916063	118826	On-line Computer Research -	ACOMPR	\$1,389.96	
999250	1	06/28/17	2916090	118826	On-line Computer Research -	ACOMPR	\$1,834.38	
999250	1	06/28/17	2916092	108655	On-line Computer Research -	ACOMPR	\$548.10	
999250	1	07/06/17	2920524	108655	On-line Computer Research -	ACOMPR	\$106.92	
999250	1	07/09/17	2920588	118826	On-line Computer Research -	ACOMPR	\$0.00	
999250	1	07/11/17	2920592	118826	On-line Computer Research -	ACOMPR	\$251.10	
999250	1	07/12/17	2920603	118826	On-line Computer Research -	ACOMPR	\$1,053.00	
999250	1	07/12/17	2920605	108655	On-line Computer Research -	ACOMPR	\$1,641.06	
999250	1	07/14/17	2923613	118826	On-line Computer Research -	ACOMPR	\$53.46	
999250	1	07/17/17	2923618	118826	On-line Computer Research -	ACOMPR	\$106.92	
999250	1	08/10/17	2928205	118826	On-line Computer Research -	ACOMPR	\$197.64	
999250	1	08/11/17	2929874	118826	On-line Computer Research -	ACOMPR	\$53.46	
999250	1	08/29/17	2934050	118826	On-line Computer Research -	ACOMPR	\$588.06	
999250	1	09/01/17	2940543	118826	On-line Computer Research -	ACOMPR	\$53.46	
999250	1	09/05/17	2940549	120359	On-line Computer Research -	ACOMPR	\$120.96	
999250	1	01/10/18	2973509	118826	On-line Computer Research -	ACOMPR	\$518.50	
999250	1	01/11/18	2973515	118826	On-line Computer Research -	ACOMPR	\$102.00	
999250	1	02/21/18	2984454	118826	On-line Computer Research -	ACOMPR	\$280.50	
999250	1	02/26/18	2986350	119475	On-line Computer Research -	ACOMPR	\$209.00	
999250	1	02/26/18	2986351	118826	On-line Computer Research -	ACOMPR	\$187.00	
999250	1	02/27/18	2986355	118826	On-line Computer Research -	ACOMPR	\$221.00	
999250	1	02/28/18	2987498	118826	On-line Computer Research -	ACOMPR	\$59.50	
999250	1	03/05/18	2988345	119475	On-line Computer Research -	ACOMPR	\$145.26	
999250	1	07/23/18	3064723	125059	On-line Computer Research - Pacer-online research	ACOMPR	\$0.40	
999250	1	08/01/18	3036539	118826	On-line Computer Research - on-line research	ACOMPR	\$156.06	
999250	1	08/07/18	3036541	118826	On-line Computer Research - on-line research	ACOMPR	\$1,441.26	
999250	1	08/23/18	3064727	125059	On-line Computer Research - Pacer-online research	ACOMPR	\$9.50	
999250	1	08/24/18	3064728	125059	On-line Computer Research - Pacer-online research	ACOMPR	\$1.40	
999250	1	08/27/18	3037503	118826	On-line Computer Research - on-line research	ACOMPR	\$128.52	
999250	1	08/28/18	3037500	118826	On-line Computer Research - on-line research	ACOMPR	\$64.26	
999250	1	08/29/18	3064729	125059	On-line Computer Research - Pacer-online research	ACOMPR	\$1.70	
999250	1	09/05/18	3064730	125059	On-line Computer Research - Pacer-online research	ACOMPR	\$2.70	
999250	1	09/06/18	3042125	111474	On-line Computer Research - online computer research	ACOMPR	\$376.38	
999250	1	09/06/18	3044833	121298	On-line Computer Research - on-line computer research	ACOMPR	\$376.38	
999250	1	09/10/18	3064731	125059	On-line Computer Research - Pacer-online research	ACOMPR	\$5.10	
999250	1	09/11/18	3044840	116108	On-line Computer Research - on-line computer research	ACOMPR	\$431.46	
999250	1	09/11/18	3064732	125059	On-line Computer Research - Pacer-online research	ACOMPR	\$12.50	
999250	1	09/19/18	3064733	125059	On-line Computer Research - Pacer-online research	ACOMPR	\$18.90	

Underberg & Kessler LLP

Billing Instruction Worksheet

Page: 7
04/25/19 11:38 AM

CLIENT CODE	MATTER CODE	WORK DATE	TRANSACTION No.	TIMEKEEPER	COST DESCRIPTION	COST CODE	AMOUNT	BILL THIS AMOUNT:
999250	1	09/20/18	3044842	118826	On-line Computer Research - on-line computer research	ACOMPR	\$385.56	
999250	1	09/20/18	3044858	116108	On-line Computer Research - on-line computer research	ACOMPR	\$128.52	
999250	1	09/23/18	3044844	118826	On-line Computer Research - on-line computer research	ACOMPR	\$128.52	
999250	1	09/23/18	3044861	108737	On-line Computer Research - on-line computer research	ACOMPR	\$257.04	
999250	1	09/24/18	3044846	118826	On-line Computer Research - on-line computer research	ACOMPR	\$238.68	
999250	1	10/15/18	3053271	118826	On-line Computer Research - Online research	ACOMPR	\$39.50	
999250	1	10/16/18	3053119	118826	On-line Computer Research - Online research	ACOMPR	\$862.92	
999250	1	10/16/18	3057698	125059	COMPUTER RESEARCH (ROC) - computer research	RACOMPR	\$284.58	
999250	1	10/17/18	3057701	125059	COMPUTER RESEARCH (ROC) - computer research	RACOMPR	\$257.04	
999250	1	10/22/18	3057677	125059	COMPUTER RESEARCH (ROC) - computer research	RACOMPR	\$321.30	
999250	1	10/25/18	3057703	125059	COMPUTER RESEARCH (ROC) - computer research	RACOMPR	\$64.26	
TOTAL:							\$27011.89	

Cost Summary

Cost Description

COMPUTER RESEARCH (ROC)
On-line Computer Research

Amount

BILL THIS AMOUNT:

\$927.18
\$26,084.71
\$27011.89

TOTAL:

Trust History